

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN**

PERRY JOHNSON,

Plaintiff,

v.

Case No. 2:22-cv-11232-MAG-JJCG

Hon. Mark A. Goldsmith

MICHIGAN BOARD OF STATE  
CANVASSERS; JOCELYN BENSON  
in her official capacity as Secretary of  
State; and JONATHAN BRATER, in  
his official capacity as Director of the  
Michigan Bureau of Elections,

Magistrate Judge Jonathan J.C. Grey

Defendants.

---

**MOTION TO INTERVENE OF CAROL BRAY**

The undersigned counsel certifies that counsel for Proposed Intervenor Carol Bray communicated in writing with opposing counsel, explaining the nature of the relief to be sought by way of this motion and seeking concurrence in this relief, on June 7 at 11:28 a.m. Three business days have lapsed since that communication, and opposing counsel has not agreed to the relief (or otherwise responded) orally or in writing.

For the reasons explained in the accompanying Brief in Support, which is fully incorporated herein, Proposed Intervenor moves to intervene either as of right under Federal Rule of Civil Procedure 24(a)(2) or by permission under Rule 24(b). In accordance with Federal Rule of Civil Procedure 24(c), Proposed Intervenor is

attaching a proposed Answer to Plaintiff's Complaint as **Exhibit 1**. In addition, Proposed Intervenor is attaching a proposed Response to Plaintiff's Ex Parte Motion for Temporary Restraining Order and/or Preliminary Injunction as **Exhibit 2**.

In the event this Court denies this Motion to Intervene, Proposed Intervenor respectfully requests that the Court accept Bray's Response to Plaintiff's Ex Parte Motion for Temporary Restraining Order and/or Preliminary Injunction for filing as an amicus brief and consider the contents of that brief when arriving at its decision.

WHEREFORE, Proposed Intervenor Carol Bray respectfully requests that this Court grant her Motion to Intervene or, alternatively, that this Court accept her Response to Plaintiff's Ex Parte Motion for Temporary Restraining Order and/or Preliminary Injunction for filing as an amicus brief and consider the contents of that brief when arriving at its decision.

Dated: June 10, 2022

Respectfully submitted

s/ Gary P. Gordon  
Steven C. Liedel\* (P58852)  
(\*admission pending)  
Gary P. Gordon (P26290)  
Kyle M. Asher (P80359)  
DYKEMA GOSSETT PLLC  
201 Townsend Street, Suite 900  
Lansing, MI 48933  
(517) 374-9184  
[sliedel@dykema.com](mailto:sliedel@dykema.com)  
[ggordon@dykema.com](mailto:ggordon@dykema.com)

**CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1**

I, Gary P. Gordon, certify that this document complies with Local Rule 5.1(a), including: double-spaced (except for quoted materials and footnotes); at least one-inch margins on the top, sides, and bottom; consecutive page numbering; and type size of all text and footnotes that is no smaller than 10-1/2 characters per inch (for non-proportional fonts) or 14 (for proportional fonts). I also certify that it is the appropriate length. Local Rule 7.1(d)(3).

By: /s/ Gary P. Gordon  
*Attorney for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 10, 2022, I electronically filed the foregoing with the Clerk of the Court using the electronic filing system, which will send notification of such filing to all counsel of record at their respective addresses as disclosed on the pleadings.

By: /s/ Gary P. Gordon  
*Attorney for Defendants*